

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA**

CASE NO: 7:21-cv-00074-BO

JO ANNE SILVA,
individually and on behalf of all
others similarly situated,

Plaintiff,

CLASS ACTION

JURY TRIAL DEMANDED

v.

CONNECTED INVESTORS, INC.,

Defendant.

_____ /

NOTICE OF CLASS ACTION SETTLEMENT

Plaintiff Jo Anne Silva and Defendant Connected Investors, Inc., (the “Parties”) jointly notify this Court that they have reached an agreement to resolve this matter on a class-wide basis. To that end, the Parties respectfully request that this Court stay all case deadlines and provide them 30 days (i) to additionally memorialize the terms of their settlement agreement, (ii) to establish a class action notice and administration plan, and (iii) for Plaintiff, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, to file her unopposed motion for preliminary approval of the class action settlement.

WHEREFORE, the Parties respectfully request that this Court stay all deadlines and provide them 30 days— until October 31, 2022—to finalize their class action settlement agreement and for Plaintiff to file her unopposed motion for preliminary approval of the Parties’ class action settlement.

Dated: September 29, 2022

Respectfully submitted,

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| <p><u>s/ David M. Wilkerson</u> DAVID M. WILKERSON NC State Bar No. 35742 Attorney for Plaintiff The Van Winkle Law Firm 11 N. Market Street Asheville, North Carolina 28801 (828)258-299 (phone) (828)257-2767 (fax) dwilkerson@vwlawfirm.com Local Civil Rule 83.1(d) Counsel</p> <p>HIRALDO P.A.</p> <p><u>/s/ Manuel S. Hiraldo</u> Manuel S. Hiraldo 401 E. Las Olas Boulevard Suite 1400 Ft. Lauderdale, Florida 33301 mhiraldo@hiral dolaw.com Telephone: 954.400.4713</p> <p>Ignacio Hiraldo, Esq. IJhiraldo@IJhlaw.com IJH Law 1200 Brickell Ave. Suite 1950 Miami, FL 33131 E: IJhiraldo@IJhlaw.com T: 786-496-4469 Pro Hac Vice</p> | <p>DENTONS US LLP <u>/s/ Joel D. Siegel</u> Joel D. Siegel (CA Bar No. 155581) (Specially Appearing) Paul M. Kakuske (CA Bar No. 190911) (Specially Appearing) 601 S. Figueroa Street, Suite 2500 Los Angeles, CA 90017-5704 Ph: (213) 892-5050 joel.siegel@dentons.com paul.kakuske@dentons.com Mark A. Silver (GA Bar No. 811928) (Specially Appearing) 303 Peachtree Street, NE, Suite 5300 Atlanta, GA 30308 Ph: (404) 527-4671 mark.silver@dentons.com</p> <p>SMITH, ANDERSON, BLOUNT, DORSETT, MITCHELL & JERNIGAN, LLP <u>/s/ John E. Harris</u> Christopher G. Smith N.C. Bar No. 22767 John E. Harris N.C. Bar No. 49253 P.O. Box 2611 Raleigh, NC 27602 Ph: (919) 821-1220; Fax: (919) 821-6800 csmith@smithlaw.com jharris@smithlaw.com Local Civil Rule 83.1(d) Counsel</p> |
| <p><i>Counsel for Plaintiff and the proposed Class</i></p> | <p><i>Counsel for Defendant</i></p> |